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April 8, 2025

Via ECF

Hon. Dale E. Ho
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: ***Doe v. Alexander et al., Case No. 25-CV-2106***

Dear Judge Ho,

We represent Defendant Tal Alexander in the above-captioned matter. With the consent of Plaintiff and co-Defendant Oren Alexander, we write on behalf of all parties in response to the Court's April 7, 2025 Order and pursuant to Rule 2(a) of the Court's Individual Rules and Practices in Civil Cases. The parties respectfully request a stay of this action and all interim deadlines pending the outcome of the Second Circuit's forthcoming decisions in Parker v. Tal Alexander et al., No. 25-487 and Doe v. Black, No. 25-564. The parties agree that the outcome of the Parker and Doe appeals will likely be dispositive of threshold legal issues in the matter at bar which would otherwise be the subject of immediate motion practice.

The parties also request that any upcoming deadlines to respond to the pending Motion to Dismiss, filed by Defendants on March 21, 2025 (*see* ECF No. 9), and Motion to Remand, filed by Plaintiff on March 31, 2025 (*see* ECF No. 15), be stayed.

Sincerely,

Milton L. Williams

Attorneys for Tal Alexander

Application GRANTED. This case shall be STAYED pending the Second Circuit's resolution of *Parker v. Alexander* and *Doe v. Black*. The parties shall monitor the Circuit's docket and file a joint status letter within five (5) business days of the resolution of the aforementioned cases proposing next steps in this litigation. That letter shall propose a briefing schedule for the pending Motion to Dismiss and Motion for Remand, if necessary. SO ORDERED. The Clerk of Court is respectfully directed to terminate ECF No. 22.

Dated: April 8, 2025
New York, New York

Dale E. Ho
United States District Judge